

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

NORTH AMERICAN SPECIALTY
INSURANCE COMPANY

Plaintiff

VS.

MARY & JOSEPHINE CORP. and
MATTEO RUSSO

Defendants

CIVIL ACTION NO: 04-10374WGY

**THE PARTIES' JOINT RULE 26(f) REPORT OF
DISCOVERY PLANNING CONFERENCE**

Now come the parties to the above captioned matter and herewith file a report of their Rule 26(f), F.R.Civ.P., Discovery Planning Conference.

The conference took place on August 9, 2004, and all parties were represented at the conference by their respective counsel of record. After good faith discussions concerning the nature of the case and the scope of expected discovery, the parties offer the following proposed discovery plan:

- 1) All Rule 26(a)(1) disclosures shall be served on or before September 30, 2004;
- 2) All interrogatories and Rule 34 requests for production of documents shall be served on or before November 1, 2004;
- 3) All fact depositions shall be concluded on or before December 31, 2004;
- 4) Expert disclosures shall be completed on or before January 30, 2005;
- 5) All expert depositions shall be completed on or before March 15, 2005; and

- 6) All dispositive motions shall be filed on or before April 4, 2005.

The Parties,
By their attorneys

NORTH AMERICAN SPECIALTY INSURANCE
COMPANY, Plaintiff

/s/ Leonard W. Langer
Tompkins, Clough, Hirshon & Langer, P.A.
Three Canal Plaza
P.O. Box 15060
Portland, ME 04112-5060
(207) 874-6700

MARY & JOSEPHINE CORP., Defendant

/s/ Richard H. Pettingell – BBO # 397320
Law Offices of Richard H. Pettingell, P.C.
77 North Washington Street – Second Floor
Boston, MA 02114
(617) 778-0890

MATTEO RUSSO, Defendant

/s/ Joseph G. Abromovitz - BBO # 011420
Law Offices of Joseph G. Abromovitz, P.C.
858 Washington Street, 3rd Floor
Dedham, MA 02026
(781) 329-1080

Dated : August 9, 2004